

ORIGINAL

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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In re : MDL No. 1285  
Misc. No. 99-197 (TFH)  
VITAMINS ANTITRUST LITIGATION. :

FILED

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JUL 30 2001

This Document Relates to:

NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT

THE PROCTER & GAMBLE COMPANY : D.D.C. No. 99 Civ. 3046 (TFH)  
et al., : (Transferred from S.D. Ohio)

Plaintiffs,

— against —

BASF AG et al.,

Defendants.

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**STIPULATION AND [PROPOSED] ORDER  
REGARDING RESPONSES  
TO THE SECOND AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED as follows:

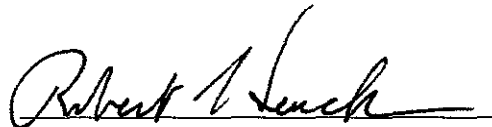
1. No defendant need respond to the Second Amended Complaint before August 10, 2001;
2. Any defendant responding to the Second Amended Complaint may serve a response incorporating as though repeating in full any motion or answer with which that defendant may have responded to the First Amended Complaint, to which may be added such other matters as that defendant is advised; and,
3. Any memorandum of points and authorities in opposition to any motion filed in response to the Second Amended Complaint shall be served 21 days after service of

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such motion, and any reply memorandum in support of such motion shall be served 14 days after service of such opposition; *provided, however*, that plaintiffs reserve the right to seek an extension of those dates from the Court to obtain discovery related to personal jurisdiction to the extent permitted by the Court; and,

4. All defenses, including but not limited to the defenses of lack of personal jurisdiction, insufficiency of service, improper venue, subject matter jurisdiction, standing, and that the Second Amended Complaint fails to comport with the leave to supplement granted by the Court, are preserved.

Dated: July 23, 2001




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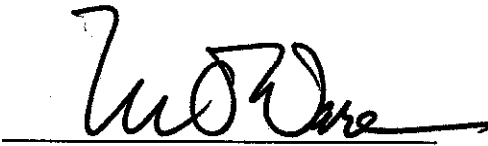
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*Attorneys for defendant Lonza Inc. and  
(solely for purposes of this stipulation)  
on behalf of all defendants properly  
served with process*

SO ORDERED, July 27, 2001:

  
Hon. THOMAS F. HOGAN  
Chief United States District Judge

**CERTIFICATE OF SERVICE**

The undersigned member of the Bar of this Court hereby certifies that on July \_\_\_\_, 2001, the foregoing Stipulation and [Proposed] Order Regarding Responses to the Second Amended Complaint was served on all counsel by the transmission of an electronic version thereof to Verilaw in accordance with the Order Regarding Electronic Service entered May 17, 2000.

  
MICHAEL O. WARE